

## **Tisa, Kimberly**

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**From:** Jeff Hamel [jhamel@woodardcurran.com]  
**Sent:** Tuesday, June 25, 2013 2:08 PM  
**To:** Tisa, Kimberly  
**Subject:** RE: Amherst College - Merrill Science PCB Soil Remediation Plan Submittal

Thanks again.  
Jeff

-----Original Message-----

**From:** Tisa, Kimberly [<mailto:Tisa.Kimberly@epa.gov>]  
**Sent:** Tuesday, June 25, 2013 1:26 PM  
**To:** Jeff Hamel  
**Subject:** RE: Amherst College - Merrill Science PCB Soil Remediation Plan Submittal

As discussed this morning, you confirmed that there was no identified PCB source with  $\geq 50$  ppm. If there is no source identified, it would not appear that the soils with  $< 25$  ppm would meet the definition of a PCB remediation waste as you've indicated below. If the soils do not meet this definition, they may be managed for disposal in accordance with the MassDEP requirements without further approval from EPA.

It is the College's responsibility to make the final determination on the classification of these soils (e.g., not a PCB remediation waste) and this should be so documented in your files. In the event a source of PCBs at  $\geq 50$  ppm is identified, compliance with 40 CFR Part 761 would be required, as you know.

The proposed sampling following excavation of the soils and removal of stockpile 1 is consistent with our discussions. Your plan also proposed sampling of stockpile 2. In the event the sampling does identify PCBs at  $> 1$  ppm, you also may wish to consider sampling the underlying ground surface following removal of this stockpile.

Should you require anything further, please contact me.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

USEPA

5 Post Office Square, Suite 100

Boston, MA 02109-3912

(o) 617.918.1527

Tisa, Kimberly6/25/2013 3:13 PM  
(f) 617.918-0527

From: Jeff Hamel [<mailto:jhamel@woodardcurran.com>]  
Sent: Tuesday, June 25, 2013 11:29 AM  
To: Tisa, Kimberly  
Subject: Amherst College - Merrill Science PCB Soil Remediation Plan Submittal

Hi Kim,

As a follow-up to our phone conversation this morning regarding the Agency's review of the above-mentioned plan submitted on June 4, 2013, the following represents our understanding of the regulatory status and next steps:

- 1) Based on the data collected and provided within the Plan, there is no evidence that a source  $\geq 50$  ppm is present or caused the residual levels of PCBs detected in building perimeter soils
- 2) Given point (1), there is no evidence that the soils meet the regulatory definition of PCB Remediation Waste per 40 CFR 761.3
- 3) Given points (1) and (2), the Agency will not be issuing an Approval to the submitted Plan
- 4) The excavation and sampling described in the June 4th plan will be implemented as submitted with the following modifications:
  - a. Following excavation activities, Subpart O verification sampling will be conducted
  - b. Following the removal of Stockpile 1, post removal soil samples from the underlying ground surface will be collected; if PCBs detected, additional soils will be removed to meet a cleanup level of 1 ppm;
- 5) PCB containing soils will be transported and disposed of off-site to the Waste Management TREE facility in Rochester, NH as a  $< 50$  ppm PCB waste not subject to 40 CFR 761 (provided their acceptance)
- 6) All soil remediation will be conducted consistent with the MCP regulations

Please call or email if you have any comments or require additional information.

Thanks

Jeff

Jeffrey Hamel, LSP, LEP  
Senior Vice President

Tisa, Kimberly6/25/2013 3:13 PM  
Woodard&Curran

978-557-8150  
978-317-3635 (cell)

